

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity  
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.  
1:20-cv-04651-SDG

**ATTORNEY DECLARATION OF AMANDA R. CALLAIS**

I, Amanda R. Callais, state as follows:

1. My name is Amanda R. Callais. I am over 18 years of age and have personal knowledge of the below facts, which are true and accurate to the best of my knowledge and belief.

2. I am an attorney with the firm of Perkins Coie LLP, and counsel for Proposed Defendant-Intervenors the Democratic Party of Georgia, DSCC, and DCCC. I make this declaration in support of Proposed Defendant-Intervenors' Opposition to Plaintiff's Motion for Preliminary Injunction.

3. Attached hereto as Exhibit 1 is a true and correct copy of Georgia Secretary of State Brad Raffensperger's NOTICE OF PUBLIC CONTEST

SELECTION OF RISK LIMITING AUDIT, which is publicly available at [https://sos.ga.gov/admin/uploads/RLA\\_Public\\_Notice\\_11092020.pdf](https://sos.ga.gov/admin/uploads/RLA_Public_Notice_11092020.pdf).

4. Attached hereto as Exhibit 2 is a true and correct copy of the article: Tal Axelrod, *Georgia secretary of state announces hand recount of presidential race*, THE HILL (Nov. 11, 2020), <https://thehill.com/homenews/campaign/525476-georgia-secretary-of-state-announces-hand-recount>.

5. Attached hereto as Exhibit 3 is a true and correct copy of Georgia Secretary of State Brad Raffensperger's Press Release: *Monitors Closely Observing Audit-Trigger Full Hand Recount: Transparency is Built into Process* (Nov. 13, 2020), [https://sos.ga.gov/index.php/elections/monitors\\_closely\\_observing\\_audit-triggered\\_full\\_hand\\_recount\\_transparency\\_is\\_built\\_into\\_process](https://sos.ga.gov/index.php/elections/monitors_closely_observing_audit-triggered_full_hand_recount_transparency_is_built_into_process).

6. Attached hereto as Exhibit 4 is November 12, 2020 Official Election Bulletin sent by Chris Harvey, State Elections Director, to all County Election Officials and County Registrars regarding the official "Audit Instructions."

7. Attached hereto as Exhibit 5 is a true and correct copy of the May 1, 2020 Official Election Bulletin sent by Chris Harvey, State Elections Director, to all County Election Officials and County Registrars regarding "Absentee Ballot Signature Review Guidance."

8. Attached hereto as Exhibit 6 is a true and correct copy of Georgia Secretary of State Brad Raffensperger's Press Release: *Number of Absentee Ballots Rejected for Signature Issues in the 2020 Election Increased 350% From 2018* (Nov. 18, 2020), which is publicly available at [https://sos.ga.gov/index.php/elections/number\\_of\\_absentee\\_ballots\\_rejected\\_for\\_signature\\_issues\\_in\\_the\\_2020\\_election\\_increased\\_350\\_from\\_2018](https://sos.ga.gov/index.php/elections/number_of_absentee_ballots_rejected_for_signature_issues_in_the_2020_election_increased_350_from_2018).

9. Attached hereto as Exhibit 7 is a true and correct copy of Georgia State Elections Board, Notice of Intent to Post a Rule of the State Elections Board, Chapter 183-1-14 and Notice of Public Hearing (Mar. 5, 2020), <https://sos.ga.gov/admin/files/SEB%20Rule%20183.1.14.13%20Reposted%20Rules%20RE%20SEB%202.28.2020.pdf> (scheduling public hearing for April 15, 2020).

10. Attached hereto as Exhibit 8 is a true and correct copy of the official election results as of November 18, as published by the Georgia Secretary of State at *Election Results: President of the United States*, <https://results.enr.clarityelections.com/GA/105369/> (last visited Nov. 18, 2020). County level results are available for download on the left-hand side of the page under the heading "Reports."

11. Attached hereto as Exhibit 9 is a true and correct copy of a Facebook post by Georgia Secretary of State Brad Raffensperger, available at *GA Secretary of State Brad Raffensperger* (@GASecretaryofState), FACEBOOK (Nov. 15, 2020), <https://www.facebook.com/GASecretaryofState/photos/a.2134798756635689/3559519377496946>.

12. Attached hereto as Exhibit 10 is a true and correct copy of the article: Tim Reid, *Republican Georgia secretary of state says no sign of widespread fraud in vote count*, REUTERS (Nov. 11, 2020, 2:54PM), <https://www.reuters.com/article/us-usa-election-georgia-recount-raffenpe/republican-georgia-secretary-of-state-says-no-sign-of-widespread-fraud-in-vote-count-idUSKBN27R33P>.

13. Attached hereto as Exhibit 11 is a true and correct copy of the article: Amy Gardner, *Ga. secretary of state says fellow Republicans are pressuring him to find ways to exclude ballots*, THE WASHINGTON POST (Nov. 16, 2020), [https://www.washingtonpost.com/politics/brad-raffensperger-georgia-vote/2020/11/16/6b6cb2f4-283e-11eb-8fa2-06e7cbb145c0\\_story.html](https://www.washingtonpost.com/politics/brad-raffensperger-georgia-vote/2020/11/16/6b6cb2f4-283e-11eb-8fa2-06e7cbb145c0_story.html).

14. Attached hereto as Exhibit 12 is a true and correct copy of the article: Stefan Becket, *2020 election “most secure in history,” security officials say*, CBS News (Nov. 13, 2020), <https://www.cbsnews.com/live-updates/2020-election-most-secure-history-dhs/>.

15. Attached hereto as Exhibit 13 is a true and correct copy of the article: Mark Niese, Absentee ballots can begin to be opened, but not counted, in Georgia, THE ATLANTA JOURNAL-CONSTITUTION (October 19, 2020), <https://www.ajc.com/politics/absentee-ballots-can-begin-to-be-opened-but-not-counted-in-georgia/BRBLHVUJOFHB5OEHAMZV34HPDA/>.

16. Attached hereto as Exhibit 14 is a true and correct copy of the article: Brian O'Shea, *Georgia recount: Metro Atlanta counties offer live feeds for voters to watch*, THE ATLANTA JOURNAL-CONSTITUTION (Nov. 15, 2020), <https://www.ajc.com/politics/election/georgia-recount-metro-atlanta-counties-offer-live-feeds-for-voters-to-watch/6MCEZ5N4JJGKTEC4IU7ELDOIRQ/>.

17. Attached hereto as Exhibit 15 is November 13, 2020 Official Election Bulletin sent by Chris Harvey, State Elections Director, to all County Election Officials and County Registrars regarding the "Allowing More Credentialed Monitors at Risk Limiting Audit Allowing Libertarian Party Monitors."

18. Attached hereto as Exhibit 16 is a true and correct copy of the expert report of Dr. Jonathan Rodden of Stanford University, dated November 18, 2020.

Dated: November 19, 2020.

**Amanda R. Callais**

Amanda R. Callais\*

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*Counsel for Proposed Intervenor-  
Defendants*

*\*Pro Hac Vice Application Pending*

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: November 19, 2020.

**Adam M. Sparks**

*Counsel for Proposed Intervenor-  
Defendants*